

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KATHLEEN MILLER,

Plaintiff

v.

Civil Action No.: 05-30117-KPN

VERIZON COMMUNICATIONS INC.,
Defendant

**JOINT MOTION TO EXTEND TIME TO FILE MOTION FOR SUMMARY
JUDGMENT AND OPPOSITION**

Verizon Communications Inc. ("Verizon") and Kathleen Miller ("Ms. Miller") hereby request a brief extension of time within which to file their respective summary judgment pleadings. Verizon's motion is currently due to be filed with the Court this Friday, May 19, 2006. Verizon is requesting a 4-business day extension of time, so that it has until Thursday, May 25, 2006 to file its Summary Judgment pleadings. Ms. Miller's Opposition to Verizon's motion is currently due on June 26, 2006. She requests a 4-day extension through June 30, 2006. In support of this joint motion, the parties state as follows:

1. This is the first such extension the parties have sought;
2. the requested extension is only for four (4) business days;
3. The parties seek this extension due to the fact that counsel for Verizon has had certain unforeseen scheduling conflicts arise, making it very difficult for Verizon to file its Motion for Summary Judgment on May 19, 2006; and

4. Plaintiff's counsel has joined in this motion, with the understanding that he will be granted a similar extension to file Plaintiff's Opposition.

WHEREFORE, the parties respectfully request that the Court grant them each a four day extension of time to file their summary judgment pleadings in the above-captioned matter.

KATHLEEN MILLER,

VERIZON COMMUNICATIONS INC.,

By her attorneys,

By its attorneys,

/s/Michael O. Shea
Michael O. Shea (BBO #55474)
Michael O. Shea, P.C.
451 Main Street
Wilbraham, MA 01095

/s/Timothy P. Van Dyck
Timothy P. Van Dyck, (BBO #548347)
Windy L. Rosebush, (BBO #636962)
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DODGE LLP
111 Huntington Avenue
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CERTIFICATE OF SERVICE

I, Timothy P. Van Dyck, hereby certify that on May 17, 2006, I caused a copy of the foregoing document to be served on Michael O. Shea, Esq., 451 Main Street, Wilbraham, MA 01095 by filing the same electronically.

/s/Timothy P. Van Dyck